

OFFICE OF THE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

MANSION VIEW DEVELOPMENT CORP.,)

Complainant.)

v.)

01-0587

MCLEODUSA TELECOMMUNICATIONS)
SERVICES, INC., and)
AMERITECH OF ILLINOIS.)

Respondents.)

CHIEF CLERK'S OFFICE

Oct 29 11 23 AM '01

ILLINOIS
COMMERCE COMMISSION

AMENDED COMPLAINT

Mansion View Development Corp., by its attorney, Steve Ackerman, complains of
Respondents as follows:

1. On or about September, 2000, Mansion View Development Corp., for itself and acting as an agent for Mansion View Realty, entered into an agreement for the provision of telephone services with McleodUSA Telecommunications Services, Inc.

2. Mansion View is in the real estate business and is dependent on reliable telephone service to operate its business. Mansion View is billed for 19 telephone lines at 1667 N. Western Ave., Chicago, Ill. 60647.

3. Between September 29, 2000 and October 10, 2001, Mansion View has recorded disrupted service on over 292 occasions in a log. Disrupted service has occurred on almost a daily basis since it began. Dial tone has been lost from one to 20 times a day. Service has been lost for as short as 10 seconds and as long as one hour.

4. Examples of disrupted service include most telephone lines going down at the

same time, the loss of dial tone, callers not being able to complete calls, and telephone conversations being interrupted by the line going down in the middle of a conversation.

5. McLeodUSA provides service to Mansion View by reselling business retail service provided by Ameritech. McLeodUSA obtains resold services pursuant to the interconnection agreement between McLeodUSA (successor entity to QST Communications, Inc.) and Ameritech Information Industry Services, as agent for Ameritech Illinois.

6. Pursuant to Section 10.8.1 of the ICA, Ameritech Illinois is responsible for the maintenance and repair of any resold services used by McLeodUSA. To the extent that maintenance or repair of facilities is required to remedy Mansion View's service problems, Ameritech Illinois is responsible for such activities pursuant to the ICA.

7. Prior to September 6, 2001, Respondents have sent numerous technicians to the business premises but were unable to correct the service disruptions.

8. On October 16, 2001, technicians of both Respondents visited the business premises and informed Mansion View that the matter had to be referred to engineering.

9. On October 22, 2001, technicians of both Respondents again visited the business premises. Mansion view was again told that the matter had to be referred to engineering.

10. Mansion View has been told that the replacement of copper lines by Ameritech is necessary to restore service.

11. Complainant is a small real estate businesses and cannot afford continued interruption of telephone services and the loss of business opportunities.

12. Mansion View requests emergency relief to restore service.

13. Statutory authority for this complaint is invested in the Illinois Commerce

Commission pursuant to 220 ILCS 5/10-109.

WHEREFORE, Mansion View Development Corp. requests emergency relief to restore service.



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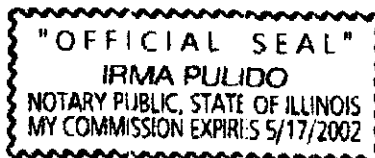
VERIFICATION

I, Richard B. Nelson first being duly sworn, say that I have read the above amended complaint and know what it says. The contents of the amended complaint are true to the best of my knowledge.



MANSSION VIEW DEVELOPMENT CORP.
By Richard Nelson, it's President

SUBSCRIBED AND SWORN
to before me this 25th day
of October 2001.


NOTARY PUBLIC

CERTIFICATE OF SERVICE

I, STEVE ACKERMAN, an attorney, certify that I served a copy of the Amended Complaint and the Notice Of Appearance upon the following by E-Mail and upon Judge Gilbert by depositing a copy of same in the U.S. Mail at Jefferson & Adams, Chicago, Illinois, postage prepaid on October 26, 2001:

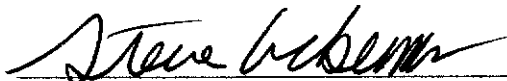
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